

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

In re:

DAVID D DOUGLAS
AUTUMN N DOUGLAS

Debtor(s)

Ronda J. Winnecour, Trustee

Movant

vs.

DAVID D DOUGLAS
AUTUMN N DOUGLAS

Respondent(s)

Case No. 20-70304JAD

Chapter 13

Document # _____

**REPLY TO TRUSTEE'S CERTIFICATE OF DEFAULT REQUESTING
DISMISSAL OF CASE**

The Debtors through counsel respectfully represent the following:

1. The debtor(s)' have cured the material default, in that the payments required by the plan have not been made.
2. The payment is \$4726 in arrears, including payment due for the month of October 2024 has been made. (See attached)

WHEREFORE, the Debtor requests that this case not be dismissed.

10/28/2024

/s/ Lawrence Willis Esq

LAWRENCE W WILLIS ESQ
PA 85299
WILLIS & ASSOCIATES
201 PENN CENTER BLVD STE 310
PITTSBURGH, PA 15235

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Related to Document No. _____

EXHIBIT

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	Date Arrived	Transaction ID	Amount	Status
		17161938	\$4,726.00	Scheduled
er 24	October 03, 2024	16950427	\$200.00	Complete
nber 24	September 19, 2024	16851488	\$300.00	Complete
nber 24	September 05, 2024	16741577	\$200.00	Complete

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CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2024, a copy of reply and exhibits was served electronically or by regular United States mail to all interested parties, the Trustee and all creditors listed below.:

DAVID D DOUGLAS
AUTUMN N DOUGLAS
266 FRANCE ST
SPROUL, PA 16682

CHAPTER 13 TRUSTEE WD PA
600 GRANT STREET
SUITE 3250 US STEEL TWR
PITTSBURGH, PA 15219

10/28/2024

/s/ Lawrence Willis

LAWRENCE W WILLIS ESQ WILLIS &
ASSOCIATES
201 PENN CENTER BLVD STE 310
PITTSBURGH, PA 15235